

EXHIBIT 1

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INTERROGATORIES

3. Identify the individual who is in charge of training/implementing policies regarding stop/frisks, undercover buy and bust or legalities of such operations to individuals such as the members of the NYPD team that arrested plaintiff.

DOCUMENTS TO BE PRODUCED

7. All documents concerning CITY of NEW YORK procedure, practice, rules, training materials and/or regulations in effect concerning:

- (a) buy and bust programs.
- (b) stops and frisks.
- (c) tactical operations for buy and bust.

8. All documents or log entries that show that the team that participated in the arrest of plaintiff attended the training or were taught about the practice and procedure outlined in the foregoing paragraphs.